

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

APRIL ANN HARVEY, wife and )  
next of kin to her husband, )  
Ramsey Robert Harvey, deceased; )  
RYAN A. HARVEY, a minor child and )  
next of kin to his father, )  
Ramsey Robert Harvey, deceased, )  
by and through his mother )  
and next friend, MISTY L. GILLIAM, )

Plaintiffs, )

Case No. 3:07-CV-00022

vs. )

CAMPBELL COUNTY, TENNESSEE; )  
Former Campbell County Sheriff )  
RON MCCLELLAN, individually and in )  
his official capacity as Sheriff; )  
Former Campbell County Chief )  
CHARLES SCOTT, individually and in )  
his official capacity as Chief Deputy; )  
Campbell County Deputy Sheriff )  
RICHARD LOWE, individually and in )  
his official capacity as a )  
Campbell County Deputy Sheriff; )  
JEFF HALL as Mayor of Campbell )  
County, Tennessee; and )  
SHERIFF GARY PERKINS, in his )  
official capacity as Sheriff of )  
Campbell County, Tennessee, )

Defendants. )

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**MOTION FOR ADDITIONAL TIME IN WHICH TO RESPOND TO THE DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT**

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Come the Plaintiffs, APRIL ANN HARVEY and RYAN A. HARVEY and request  
that this Court grant them additional time Pursuant to Rule 56, Federal Rules of Civil

Procedure, in which to file their responses to the Defendants' Motion for Summary Judgment. Plaintiffs are requesting an additional thirty (30) days. In support of this Motion, the Plaintiffs state as follows:

1. In order to sufficiently and properly respond to the Defendants' Motion for Summary Judgment, additional time will be needed.
2. Plaintiffs may need to conduct additional discovery in order to sufficiently and properly respond to the issues raised by the Defendants' Motion for Summary Judgment.
3. Plaintiffs have spoken with counsel for Defendants, Arthur F. Knight, III, who has kindly agreed that Plaintiffs should have an additional (thirty) 30 days from the date of the filing of this Motion in which to respond to Defendants' Motion for Summary Judgment.
4. Granting this Motion will not prejudice the case.

Respectfully Submitted this the 21st day of October, 2008,

By: s/William T. Wray, Jr  
William T. Wray, Jr., Esq.  
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Attorney for Plaintiff Ryan A. Harvey,  
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and

By: s/Kristie A. Anderson  
(Signed with permission on behalf of  
Kristie Anderson)  
Kristie N. Anderson, Esq.  
BPR No. 021840  
Attorney for Plaintiff April Ann Harvey,  
P.O. Box 196  
Jacksboro, Tennessee 37757  
Phone: (423) 566-9092  
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#### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

Dated this 21st day of October, 2008.

BY: s/William T. Wray, Jr.  
William T. Wray, Jr.